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U.S. DISTRICT COURT  
DISTRICT OF MASS.

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

DEBORAH CHIN, Individually and On Behalf)	Civil Action No. 04-CV-10294-DPW
of All Others Similarly Situated,	)
	)
Plaintiff,	)
	)
vs.	)
	)
SONUS NETWORKS, INC., et al.,	)
	)
Defendants.	)
	)
_____	)
MICHELLE TREBITSCH, On Behalf of	Civil Action No. 04-CV-10307-DPW
Herself and All Others Similarly Situated,	)
	)
Plaintiff,	)
	)
vs.	)
	)
SONUS NETWORKS, INC., et al.,	)
	)
Defendants.	)
	)
_____	)

[Caption continued on following page.]

GLOBAL UNDERVALUED SECURITIES MASTER FUND'S NOTICE OF MOTION AND  
MOTION TO BE APPOINTED LEAD PLAINTIFF PURSUANT TO §21D(A)(3)(B) OF THE  
SECURITIES EXCHANGE ACT OF 1934 AND FOR APPOINTMENT OF LEAD COUNSEL

Case 1:04-cv-10294-DPW Document 39 Filed 04/12/2004 Page 2 of 15

RICHARD CURTIS, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

vs.

SONUS NETWORKS, INC., et al.,

Defendants.

Civil Action No. 04-CV-10314-MLW

CLASS ACTION

RONALD KASSOVER, On Behalf of the  
Ronald Kassover IRA and All Others Similarly  
Situating,

Plaintiff,

vs.

SONUS NETWORKS, INC., et al.,

Defendants.

Civil Action No. 04-CV-10329-DPW

CLASS ACTION

STEVE L. BAKER, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

vs.

SONUS NETWORKS, INC., et al.,

Defendants.

Civil Action No. 04-CV-10333-DPW

CLASS ACTION

[Caption continued on following page.]

MICHAEL KAFFEE, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

vs.

SONUS NETWORKS, INC., et al.,

Defendants.

) Civil Action No. 04-CV-10345-DPW

) CLASS ACTION

HAIMING HU, Individually and On Behalf of  
All Others Similarly Situated,

Plaintiff,

vs.

SONUS NETWORKS, INC., et al.,

Defendants.

) Civil Action No. 04-CV-10346-DPW

) CLASS ACTION

CHARLES STARBUCK, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

vs.

SONUS NETWORKS, INC., et al.,

Defendants.

) Civil Action No. 04-CV-10362-DPW

) CLASS ACTION

[Caption continued on following page.]

SAMUEL HO, Individually and On Behalf of ) Civil Action No. 04-CV-10363-DPW  
All Others Similarly Situated, )  
 ) CLASS ACTION  
Plaintiff, )

vs. )

SONUS NETWORKS, INC., et al., )  
 )  
Defendants. )

JEFFREY C. RODRIGUES, Individually and ) Civil Action No. 04-CV-10364-DPW  
On Behalf of All Others Similarly Situated, )  
 ) CLASS ACTION  
Plaintiff, )

vs. )

SONUS NETWORKS, INC., et al., )  
 )  
Defendants. )

ROBERT CONTE and MARK RESPLER, ) Civil Action No. 04-CV-10382-DPW  
Themselves and On Behalf of All Others )  
Similarly Situated, ) CLASS ACTION

Plaintiffs, )

vs. )

SONUS NETWORKS, INC., et al., )  
 )  
Defendants. )

[Caption continued on following page.]

WHEATON ELECTRICAL SERVICES  
RETIREMENT 401K PROFIT SHARING  
PLAN, On Behalf of Itself and All Others  
Similarly Situated,

Plaintiff,

vs.

SONUS NETWORKS, INC., et al.,

Defendants.

) Civil Action No. 04-CV-10383-DPW

) CLASS ACTION

\_\_\_\_\_  
BRIAN CLARK, Individually and On Behalf  
of All Others Similarly Situated,

Plaintiff,

vs.

SONUS NETWORKS, INC., et al.,

Defendants.

) Civil Action No. 04-CV-10454-DPW

) CLASS ACTION

\_\_\_\_\_  
SHEILA BROWNELL, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

vs.

SONUS NETWORKS, INC., et al.,

Defendants.

) Civil Action No. 04-CV-10597-DPW

) CLASS ACTION

\_\_\_\_\_  
[Caption continued on following page.]

SAVERIO PUGLIESE, On Behalf of Himself ) Civil Action No. 04-CV-10612-DPW  
and All Others Similarly Situated, )

Plaintiff, )

vs. )

SONUS NETWORKS, INC., et al., )

Defendants. )

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DAVID V. NOCITO, On Behalf of Himself ) Civil Action No. 04-CV-10623-DPW  
and All Others Similarly Situated, )

Plaintiff, )

vs. )

SONUS NETWORKS, INC., et al., )

Defendants. )

CLASS ACTION

CLASS ACTION

PLEASE TAKE NOTICE that the Global Undervalued Securities Master Fund ("Movant"), which purchased the common stock of Sonus Networks, Inc. ("Sonus" or the "Company") between April 9, 2003 and February 12, 2004 (the "Class Period"), hereby moves this Court for an order granting its Motion to Be Appointed Lead Plaintiff Pursuant to §21D(a)(3)(B) of the Securities Exchange Act of 1934 and for Appointment of Lead Counsel ("Motion").

This Motion is brought pursuant to §21D of the Securities Exchange Act of 1934 ("Exchange Act") and on the grounds that Movant has timely filed the instant motion and is the "most adequate plaintiff." In addition, Movant seeks the Court's approval of its selection of Darren J. Robbins and Travis E. Downs III of the law firm of Milberg Weiss Bershad Hynes & Lerach LLP as Lead Counsel and Melick, Porter & Shea LLP as Liaison Counsel for the class pursuant to §21D(a)(3)(B)(iv), 15 U.S.C. §78u-4(a)(3)(B)(iv).

This Motion is based upon this notice of motion, the accompanying memorandum in support thereof, the affidavit of John E. DeWick, the pleadings and other files and records in each of these actions, and such other written or oral argument as may be permitted by the Court at the hearing on this motion.<sup>1</sup>

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<sup>1</sup> Local Rule 7.1(a)(2) requires a conference of counsel prior to filing motions. Movant respectfully submits that this conferral requirement is unnecessary in the context of motions for lead plaintiff since movants have no way of knowing which other entities plan to move for appointment as lead plaintiff until after they have filed their motions. In addition, Local Rule 7.1(a)(2) may be inapplicable to motions for selection of lead plaintiff and approval of lead counsel because such motions are mandated by federal statute. Section 21D of the Exchange Act, as amended by the Private Securities Litigation Reform Act of 1995, sets forth the procedure that must be followed for the selection of lead plaintiff and approval of lead counsel. *See* 15 U.S.C. §§78u-4, *et seq.* Under these circumstances, Movant submits that the conferral requirement of Local Rule 7.1(a)(2) does not apply.



### REQUEST FOR ORAL ARGUMENT

Pursuant to Local Rule 7.1(d), Movant hereby requests oral argument as to this Motion.

DATED: April 12, 2004

MELICK, PORTER & SHEA, LLP  
RICHARD J. SHEA (BBO 456310)  
JOHN E. DeWICK (BBO 654723)

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document  
was served upon the attorney of record for each party by  
mail on 4/12/04

John E. DeWick

John E. DeWick

JOHN E. DeWICK

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[Proposed] Lead Counsel for Plaintiffs

DECLARATION OF SERVICE BY MAIL

I, the undersigned, declare:

1. That declarant is and was, at all times herein mentioned, a citizen of the United States and a resident of the County of San Diego, over the age of 18 years, and not a party to or interest in the within action; that declarant's business address is 401 B Street, Suite 1700, San Diego, California 92101.

2. That on April 12, 2004, declarant served the GLOBAL UNDERVALUED SECURITIES MASTER FUND'S NOTICE OF MOTION AND MOTION TO BE APPOINTED LEAD PLAINTIFF PURSUANT TO §21D(A)(3)(B) OF THE SECURITIES EXCHANGE ACT OF 1934 AND FOR APPOINTMENT OF LEAD COUNSEL by depositing a true copy thereof in a United States mailbox at San Diego, California in a sealed envelope with postage thereon fully prepaid and addressed to the parties listed on the attached Service List.

3. That there is a regular communication by mail between the place of mailing and the places so addressed.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 12th day of April, 2004, at San Diego, California.

  
SHARON E. FORD

SONUS NETWORKS-CA

Service List - 4/6/2004 (04-0069)

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